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3M

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8EHQ 0808-0033
8EHQ-80-373

Re: TSCA 8(e) Substantial Risk Notice: Supplemental to Docket No. 8EHQ-0598-373;
Sulfonate-based and Carboxylate-based Fluorochemicals

To whom it may concern:

3M is submitting this notice to supplement its previous submissions on sulfonate and carboxylate-based fluorochemicals.

3M recently received data from a 13 week dietary study on perfluorooctanesulfonate (PFOS) in rats. The study was designed to investigate the reversibility of hepatomegally and thyroid effects previously demonstrated in rats exposed to PFOS. Rats were administered either 20 or 100 ppm PFOS in the diet *ad libitum* for 7 days. This was followed by an 84-day recovery period during which all animals were fed untreated chow. Ten animals were sacrificed from each group on study days 8, 36, 64, and 92. At sacrifice, various samples were collected for various analyses.

PFOS treatment had no effect on the thyroid parameters evaluated. Previously documented hepatic effects were observed, and reversibility of these effects was not complete. Hepatic apoptosis had not completely reversed following the 84 day recovery period. In addition, microsomal cytochrome P450 content and representative monooxygenase activities were maintained through the treatment-free recover period.

While the biological significance of these observations remains unclear, and 3M does not believe that any of these data taken alone or cumulatively meet the "substantial risk" reporting threshold, we nevertheless recognize the ongoing work by U.S. EPA to assess fluorochemical exposure pathways. Therefore, we are placing these results in the 8(e) docket as a supplement to previous submissions.

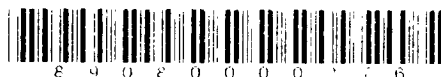
If you have any questions or would like any additional information, please contact Deanna Luebker at (651) 737-1374 or djluebker@mmm.com.

Sincerely,

Jean B. Sweeney (add)

Jean B. Sweeney
Staff Vice President, 3M Environmental, Health and Safety Operations

Enclosure



MR 313651